

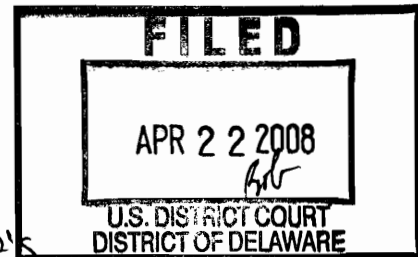
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ADAM HACKETT,  
Plaintiff,

v.

CA. No. 06-426 JJSf

CORRECTIONAL MEDICAL SERVICES,  
INC.




AFFIDAVIT IN SUPPORT OF Plaintiff's  
Motion to STRIKE Defendant's CMS  
Motion For Summary Judgement  
Pursuant to FRCP 12(f).

This Affidavit is being Submitted in Support, of the Above  
Captioned Motion to STRIKE Defendant CORRECTIONAL MEDICAL Service's  
INC's. "Motion For Summary Judgement".

I, Am the Affiant, ADAM HACKETT, who duly, Swears  
Under Penalty of Perjury on this 17th day of APRIL 2008,  
Pursuant to 10 Delaware Code 5323 AND 28 U.S.C. 1746. that the  
Statement's here in are true And correct to the best of  
My knowledge And belief:

1. That, All Statements made by Plaintiff in his "Motion to Strike"  
Are in good Faith,

2. That, All Statements Reflect "Actual Events" And From the  
basis OF A REAL And Not A Feigned Purpose.

3. That Defendant, CORRECTIONAL MEDICAL SERVICES, INC.; ARE NO STRANGER TO EITHER THE COURTS OF DELAWARE, ARKANSAS, MICHIGAN, MISSOURI, OR MARYLAND WHEN IT COMES TO CLAIMS OF DELIBERATE INDIFFERENCE TO INMATES MEDICAL NEEDS.
4. THAT, AFTER THE NEWS JOURNAL PUBLISHED ITS FOUR-DAY-EXPOSE ON DEPLORABLE MEDICAL CARE PROVIDED BY DELAWARE DEPARTMENT OF CORRECTIONS MEDICAL-VENDOR DEFENDANTS CORRECTIONAL MEDICAL SERVICES, INC. THE NEWS JOURNAL EXPOSURE AND PUBLIC OUTCRY FINALLY PUSHED THE CIVIL RIGHTS DIVISION OF THE U.S. DEPARTMENT OF JUSTICE TO OPEN "FORMAL INQUIRY" INTO MEDICAL CARE AND OTHER SYSTEMATIC ISSUES INSIDE DELAWARE PRISONS. SOURCES; THE NEWS JOURNAL; DELAWARE STATE NEWS.
5. THAT, ACCORDING TO FORMER COMMISSIONER OF DELAWARE DEPARTMENT OF CORRECTIONS STAN TAYLOR SAID: "ALL PRISONER HEALTH CARE GRIEVANCES GO DIRECTLY TO CMS SO THEY CAN BE HANDLED ON THE LOCAL LEVEL". IF THE GRIEVANCE IS DENIED, PRISONERS CAN APPEAL, TO GUARDS, WHO LACK MEDICAL TRAINING AND IN TURN ASK CMS FOR ADVICE. A FINAL DECISION IS MADE BY TWO SENIOR DDOC OFFICIALS, WHO ALSO TURN TO CMS WHEN MEDICAL ISSUES ARE RAISED AS THEY TOO LACK MEDICAL TRAINING.
- THIS AFFIDAVIT HAS BEEN DULY SWORN AND SUBSCRIBED, TO PURSUANT TO 10 DEL CODE 5323 AND 28. U.S.C.A 1746 ON THIS 17<sup>TH</sup> DAY OF APRIL 2008
-   
 ADAM HACKETT, AFFIANT